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Attorneys for Defendants
Brown & Brown Insurance Services, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTORIA WACKER, an individual,
Plaintiff,

v.

BROWN & BROWN INSURANCE SERVICES,
INC., a foreign corporation; AMERICAN
MODERN HOME INSURANCE COMPANY, a
foreign corporation; DOES 1-20 and ROE
BUSINESS ENTITIES 1-20, inclusive,
Defendants.

Case Number: 2:25-cv-00703

**JOINT MOTION TO EXTEND TIME
TO ANSWER COMPLAINT
(FIRST REQUEST)**

Pursuant to LR-IA 6-1, Plaintiff VICTORIA WACKER and Defendant BROWN & BROWN INSURANCE SERVICES, INC. (“Brown & Brown” and collectively, the “Parties”), by and through their undersigned counsel, hereby submit this Motion to Extend Time to Answer Complaint for an extension of time for Brown & Brown to answer the complaint. This is the first motion to extend time to answer the complaint. Defendant AMERICAN MODERN HOME INSURANCE COMPANY (“American Insurance”), although having appeared, does not join in this request and is not a party to it.

Brown & Brown was served in the underlying state court action on April 7, 2025, and American Insurance removed the case to federal court on April 21, 2025. Therefore, pursuant to Federal Rule of Civil Procedure 81(c)(2), Brown & Brown’s current deadline to respond is April 28, 2025.

1 Good cause exists for this extension. Following removal, Brown & Brown requires additional
2 time to review the complaint under the applicable federal pleading standards and to answer the
3 complaint. This request is made before the current deadline expires, is brought in good faith, and is
4 not intended to cause delay. No party will be prejudiced by the brief extension. This motion does not
5 request an extension of the time for Brown & Brown to plead a Rule 12 motion.

6 Accordingly, the Parties respectfully request that the Court extend Brown & Brown's deadline
7 to answer the complaint **to May 12, 2025**.

8 RESPECTFULLY SUBMITTED this 25th day of April 2025.

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10 **DUANE MORRIS, LLP**

11 /s/ Daniel Heidtke
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RICHARD HARRIS LAW FIRM

/s/ Charles Jackson (with permission)
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Victoria Wacker

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 VICTORIA WACKER, an individual,

4 Plaintiff,

5 v.

6 BROWN & BROWN INSURANCE SERVICES,
7 INC., a foreign corporation; AMERICAN
8 MODERN HOME INSURANCE COMPANY, a
foreign corporation; DOES 1-20 and ROE
BUSINESS ENTITIES 1-20, inclusive,

9 Defendants.

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**[PROPOSED] ORDER GRANTING
JOINT MOTION TO EXTEND TIME
TO ANSWER COMPLAINT
(FIRST REQUEST)**

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11 Pending before the Court is the Joint Motion by Plaintiff VICTORIA WACKER and
12 Defendant BROWN & BROWN INSURANCE SERVICES, INC. ("Brown & Brown") to extend the
13 deadline for Brown & Brown to answer the complaint.

14 GOOD CAUSE APPEARING THEREFOR:

15 Defendant BROWN & BROWN INSURANCE SERVICES, INC. shall have until May 12,
16 2025, to file its answer to the complaint.

17 **IT IS SO ORDERED** this 28 day of April, 2025.

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U.S. MAGISTRATE JUDGE
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